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Ross University School of Medicine and
Global Education International, Inc.

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

ROSS UNIVERSITY SCHOOL OF MEDICINE and GLOBAL EDUCATION INTERNATIONAL, INC.,	:	Civil Action No. 3:13-CV-06121-AET-TJB
Plaintiffs,	:	DECLARATION OF
v.	:	<u>JAMES P. FLYNN, ESQ.</u>
BEHZAD AMINI, WWW.ROSSU.NET, WWW.ROSSMEDICALSCHOOL.ORG, WWW.ROSSMEDSCHOOL.COM and <u>WWW.JOHNDOEROSSINFRINGINGSITES1</u> <u>-20.DOE</u>	:	
Defendants.	:	

I, JAMES P. FLYNN, pursuant to 28 U.S.C. §1746, hereby declare as follows:

1. I am an attorney duly licensed to practice in the State of New Jersey and a member of the firm of Epstein Becker & Green, P.C., attorneys for plaintiffs Ross University School of Medicine (“RUSM”) and Global Education International, Inc. (collectively, “Plaintiffs”) in the above-captioned action.

2. I respectfully submit this supplemental declaration in further support of Plaintiffs’ application for an order holding defendant Behzad Amini in civil contempt for violating the Court’s Order of Preliminary Injunction dated December 9, 2013 (“Preliminary Injunction”), as well as the Temporary Restraining Order dated October 16, 2013 (“TRO”) and

Order Providing for Continuing Injunction dated October 28, 2013 (“Continuing Injunction”), and for certain related interim relief.

3. Just this afternoon, I received an email from Amini in which he advised that he is “leaving [the] United States...indefinitely”, effective Saturday, December 21, 2013.

4. Even though this matter remains on the active docket, Amini declared that “[t]oday would be my last court appearance in this matter . . .”

5. Notwithstanding that this Court has enjoined him from disparaging RUSM and its personnel and affiliates, Amini states in his email: “I would however continue with expressing my free speech and grievance against your client, every single day, as long as I live. Good luck with your lawsuit.”

6. I have attached hereto a true copy of Amini’s email along with my response to him as Exhibit A.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 19, 2013

/s/ James P. Flynn
James P. Flynn

EXHIBIT A

REDACTED

From: James P. Flynn
Sent: Thursday, December 19, 2013 12:52 PM
To: 'Ben Amini'
Cc: William S. Gyves; 'john_basilone@njd.uscourts.gov'
Subject: RE: FW: Ross University v. Amini et al

Mr. Amini,

The Court has specified Friday, December 20, 2013 at 4pm as the new time for discussion with court. Since you are still in United States until Saturday, your participation Friday at 4pm is expected, unless court sets earlier date or time.

Very truly yours,

Jim

-----Original Message-----

From: Ben Amini [<mailto:bccpda@yahoo.com>]
Sent: Thursday, December 19, 2013 12:01 PM

To: James P. Flynn
Subject: Re: FW: Ross University v. Amini et al

Mr. Flynn,

Just to inform you that I am leaving United States this Saturday indefinitely. Today would be my last court appearance in this matter as I would not be able to participate in these proceedings anymore due to lack of resources and not being able to represent myself from a foreign jurisdiction.

I would however continue with expressing my free speech and grievance against your client, every single day, as long as I live.

Good luck with your lawsuit.

On Thu, 12/19/13, James P. Flynn <JFlynn@ebglaw.com> wrote:

Subject: FW: Ross University v. Amini et al
To: "bccpda@yahoo.com" <bccpda@yahoo.com>
Date: Thursday, December 19, 2013, 8:15 AM

Dial in for 11:30 am
eastern call with Court--888 324 2213 code 973 639 8285

James P. Flynn | Bio

t 973.639.8285 | f
973.639.8931

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Think
Green. Please consider the environment before you print
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